### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

DANIEL UMPA, individually and on	)
behalf of all others similarly situated,	
Plaintiffs, v.  NATIONAL ASSOCIATION OF REALTORS, ET AL., Defendants.	Case No. 4:23-CV-00945  Honorable Stephen R. Bough  Oral Argument Requested  Oral Oral Argument Requested
	)

# DEFENDANT HANNA HOLDINGS INC.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION OR, IN THE ALTERNATIVE, TO TRANSFER TO THE WESTERN DISTRICT OF PENNSYLVANIA

Defendant Hanna Holdings, Inc. moves to be dismissed from this action for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2), or in the alternative, to transfer the claims against it to the Western District of Pennsylvania pursuant to 28 U.S.C. § 1404(a), § 1406(a), or § 1631. In support, Hanna Holdings relies on the Suggestions submitted alongside this motion and the Declaration of Tracy Rossetti Delvaux submitted with the Suggestions.

Dated: February 26, 2024

#### Respectfully submitted,

#### /s/ Seth P. Waxman

Seth P. Waxman (pro hac vice)
Karin Dryhurst (pro hac vice)
Claire Bergeron (pro hac vice)
WILMER CUTLER PICKERING
HALE AND DORR LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037
(202) 663-6000
seth.waxman@wilmerhale.com
karin.dryhurst@wilmerhale.com
claire.bergeron@wilmerhale.com

David Z. Gringer (pro hac vice)
Emily Barnet (pro hac vice)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
david.gringer@wilmerhale.com
emily.barnet@wilmerhale.com

Eric Soller (pro hac vice forthcoming)
William Pietragallo II (pro hac vice forthcoming)
Quintin DiLucente (pro hac vice forthcoming)
PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP
One Oxford Centre, 38th Fl.
Pittsburgh, PA 15219
(412) 263-1836
EGS@Pietragallo.com
WP@Pietragallo.com
QD@Pietragallo.com

Attorneys for Hanna Holdings, Inc.

## **CERTIFICATE OF SERVICE**

I certify that on February 26, 2024, this document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Seth P. Waxman

Seth P. Waxman